

# EXHIBIT A



Chad Dunn &lt;chad@brazilanddunn.com&gt;

## New Court Order

David West <David.West@unitedlex.com>

Tue, Jun 28, 2022 at 1:56 PM

To: Jim Dunnam <jimdunnam@dunnamlaw.com>, Danielle Hatchitt <dhatchitt@wshlp.com>

Cc: Colleen Murphey <cmurphey@wshlp.com>, Jan Blair <JBlair@wshlp.com>, Vedran Camdzic <vedran.camdzic@unitedlex.com>, Lauren Dinner <Lauren.Dinner@unitedlex.com>, Eleeza Johnson <eleezajohnson@dunnamlaw.com>, Julie Springer <jspringer@wshlp.com>, Jamie McConnell <Jamie.McConnell@unitedlex.com>, Christopher Burton <christopher.burton@unitedlex.com>, Nicole Ratliff <nicole@dunnamlaw.com>, "chad@brazilanddunn.com" <chad@brazilanddunn.com>, Andrea Mehta <andreamehta@dunnamlaw.com>, "lgeisler@texttrial.com" <lgeisler@texttrial.com>, Jeff Brown <Jeff.Brown@unitedlex.com>, Geoff Weisbart <gweisbart@wshlp.com>, Mia Storm <MStorm@wshlp.com>, Sara Janes <SJanes@wshlp.com>, ULX Baylor Doe et al v Baylor <ULX\_Baylor\_Doe\_et\_al\_v\_Baylor@unitedlex.com>, "quesada@texttrial.com" <quesada@texttrial.com>, "smccaffity@texttrial.com" <smccaffity@texttrial.com>, Lisa Brown <lbrown@thompsonhorton.com>, Ryan Newman <rnewman@thompsonhorton.com>, Holly McIntush <hmcintush@thompsonhorton.com>

Hi all,

While performing our analysis, we identified the source data as shared by ULX to all parties on 3/9/2022 in the attached email. If the identification of these sources is incorrect please let us know and we can adjust the following metrics accordingly.

Baylor:

1. Documents not turned over to Plaintiffs by ULEX at all: 547,623
2. Document turned over with redactions: 1,435

Pepper Hamilton:

1. Documents not turned over to Plaintiffs by ULEX at all: 1,363,806
2. Document turned over with redactions: 930

Production Numbers		
Set	Pepper Hamilton	Baylor
Total Docs Received	1,371,660	563,602
Total Docs Produced	7,854	15,979
Total Docs Produced with Redactions	930	1,435

Lastly, here is an up to date list of all documents produced by ULX to Plaintiffs.

Volume	ProdBegBates	ProdEndBates	Doc Count	Image Count	Native Count	Size (GB)	Date Sent	Sent To	# of Copies	Delivery Method	Password
CLARK001	CLARK0000001	CLARK0002439	986	2,439	25	1.11	04/16/2020	All Parties	1	Sharefile	M\^9a8("+"D-tHYT

EISNER001	EISNER0000001	EISNER0005645	1,210	5,645	1	2.24	04/16/2020	All Parties	1	Sharefile	M\^9a8("+D-tHYT
SCOTT001	SCOTT0000001	SCOTT0001474	529	1,474	3	0.62	04/16/2020	All Parties	1	Sharefile	M\^9a8("+D-tHYT
SELLS001	SELLS0000001	SELLS0006796	1,331	6,796	20	2.83	04/16/2020	All Parties	1	Sharefile	M\^9a8("+D-tHYT
SMITH-CORTEZ001	SMITH-CORTEZ0000001	SMITH-CORTEZ0007176	1,399	7,176	9	2.86	04/16/2020	All Parties	1	Sharefile	M\^9a8("+D-tHYT
THOMPSON001	THOMPSON0000001	THOMPSON0005591	642	5,591	1	1.04	04/16/2020	All Parties	1	Sharefile	M\^9a8("+D-tHYT
WYNN001	WYNN0000001	WYNN0013536	2,527	13,536	26	4.95	04/16/2020	All Parties	1	Sharefile	M\^9a8("+D-tHYT
ULJD11VOL005	Exisiting Bates	Exisiting Bates	589	6,814	125	1.10	02/07/2022	All Parties	1	Sharefile	jT@_86a2Yj^SQ,M4
ULJD11VOL009	Exisiting Bates	Exisiting Bates	695	4,875	59	2.27	02/22/2022	All Parties	1	Sharefile	QCbXp/!-SEdS5lyu
ULJD11VOL009b	Exisiting Bates	Exisiting Bates	631	4,241	35	1.05	03/03/2022	All Parties	1	Sharefile	WebV7a2cCJ"FM52W
Accounting Log 125 Total with FERPA Removed (29)	Exisiting Bates	Exisiting Bates	29	29	0	1.05	03/14/2022	All Parties	1	Sharefile	je@CUF\j2/R:7scrj 7&
Accounting Log 125 Total with FERPA Removed (84)	Exisiting Bates	Exisiting Bates	84	84	0	1.05	03/14/2022	All Parties	1	Sharefile	je@CUF\j2/R:7scrj 7&
Accounting Log 355 Total with FERPA Removed (2)	Exisiting Bates	Exisiting Bates	2	2	0	1.05	03/14/2022	All Parties	1	Sharefile	je@CUF\j2/R:7scrj 7&
Accounting Log 355 Total with FERPA REMoved (81)	Exisiting Bates	Exisiting Bates	81	81	3	1.05	03/14/2022	All Parties	1	Sharefile	je@CUF\j2/R:7scrj 7&
Accounting Log 355 Total with FERPA Removed (258)	Exisiting Bates	Exisiting Bates	258	258	8	1.05	03/14/2022	All Parties	1	Sharefile	je@CUF\j2/R:7scrj 7&
JD11VOLPH2	Exisiting Bates	Exisiting Bates	313	6,756	43	1.67	03/24/2022	All Parties	1	Sharefile	tp%\2N;\$Z'k(YK6x
JD11HCb	ULPH5168243	ULPH5502742	3,240	92,215	0	2.03	03/28/2022	All Parties	1	Sharefile	f4H4'UtYw'nMVA[Q
JD11VOLPHa	Exisiting Bates	Exisiting Bates	964	9,216	49	2.93	04/08/2022	All Parties	1	Sharefile	97h+sd'cH?B&eCDU
JD11VOLPHb	Exisiting Bates	Exisiting Bates	795	8,266	33	1.49	04/08/2022	All Parties	1	Sharefile	yq%j]MXF4Jpkav+k
JD11HCa	Exisiting Bates	Exisiting Bates	5,357	46,791	0	1.98	04/08/2022	All Parties	1	Sharefile	psbQ87mArdAjBu4
FERPA Release	Exisiting Bates	Exisiting Bates	7	63	0	0.27	04/08/2022	All Parties	1	Sharefile	2~%'+#Hh(%f57uRs
5/17/2021 Export	Exisiting Bates	Exisiting Bates	906	4,941	0		05/17/2022	All Parties	1	Sharefile	
JD11VOL011 Variance Production	Exisiting Bates	Exisiting Bates	1,239	66,781	120		05/20/2022	All Parties	1	Sharefile	eRE/(6GEs'Sic]JR
JD11VOL005 & 009 Additional Docs	Exisiting Bates	Exisiting Bates	440	3,163	15	1.14	06/16/2022	All Parties	1	Sharefile	A2rB82wQZf=Wx!!%
JD11VOL12	Exisiting Bates	Exisiting Bates	765	5,998	21	1.63	06/24/2022	All Parties	1	Sharefile	QCbXp/!-SEdS5lyu

JD11VOL12 - PH	Exisiting Bates	Exisiting Bates	572	4,395	18	0.97	06/24/2022	All Parties	1	Sharefile	QCbXp/!-SEdS5lyu
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Please let me know if this answers your questions or if you have anything further

David West, RCA | Project Manager, Litigation Professional Services | UnitedLex | +1 (224) 221-8527



Upcoming OOO: None

**From:** David West <David.West@unitedlex.com>  
**Sent:** Monday, June 27, 2022 3:44 PM  
**To:** Jim Dunnam <jimdunnam@dunnamlaw.com>; Danielle Hatchitt <dhatchitt@wshllp.com>  
**Cc:** Colleen Murphey <cmurphey@WSHLLP.com>; Jan Blair <JBlair@WSHLLP.com>; Vedran Camdzic <vedran.camdzic@unitedlex.com>; Lauren Dinner <Lauren.Dinner@unitedlex.com>; Eleeza Johnson <eleezajohnson@dunnamlaw.com>; Julie Springer <jspringer@wshllp.com>; Jamie McConnell <Jamie.McConnell@unitedlex.com>; Christopher Burton <christopher.burton@unitedlex.com>; Nicole Ratliff <nicole@dunnamlaw.com>; chad@brazilanddunn.com; Andrea Mehta <andreamehta@dunnamlaw.com>; lgeisler@texttrial.com; Jeff Brown <Jeff.Brown@unitedlex.com>; Geoff Weisbart <gweisbart@wshllp.com>; Mia Storm <MStorm@WSHLLP.com>; Sara Janes <SJanes@WSHLLP.com>; ULX\_Baylor\_Doe\_et\_al\_v\_Baylor <ULX\_Baylor\_Doe\_et\_al\_v\_Baylor@unitedlex.com>; quesada@texttrial.com; smccaffity@texttrial.com; Lisa Brown <lbrown@thompsonhorton.com>; Ryan Newman <rnewman@thompsonhorton.com>; Holly McIntush <hmcintush@thompsonhorton.com>  
**Subject:** RE: New Court Order

Hi Jim,

We have received this and are currently working on it.

In March we provided you with the below information regarding what we have in our possession. I am putting that information here again for ease of reference. Additionally, we have previously provided the information regarding what we have produced, but we are currently working on updating that information to include the most recent productions which have been made, as well as answers to your direct questions, and hope to have that information updated and provided to you by tomorrow.

Please let me know if this will work or if you have any questions.

Thanks.

Hello, all.

Following up with the contents of each workspace to confirm the representation of source data, as Lauren alluded to earlier in her emails. Please review the below and confirm the highlighted "source" data information is correct per your records. Once the source data information is confirmed, we will be able to provide Jim with the number of total Baylor and Pepper Hamilton documents received and produced within the requested time frames.

Date	Restore 1	Documents	Source	Data Transmission
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Jul-19	ARM	1,329,615	Pepper Hamilton	Hard Drive
<b>Total:</b>		1,329,615		

Date	Restore 2	Documents	Source	Data Transmission
Jul-19	ARM	126	Pepper Hamilton	FTP
<b>Total:</b>		126		

Date	Restore 3	Documents	Source	Data Transmission
Jul-19	ARM	2,892	Pepper Hamilton	FTP
<b>Total:</b>		2,892		

Date	ULX Created Workspace	Documents	Source	Data Transmission
Jul-19	Native Data	32,258	Pepper Hamilton	FTP
Aug-19	Baylor	17,182	Baylor	FTP
Dec-19	Received by PwC	447,453	Baylor	Hard Drive
Mar-20	Received by PwC	98,452	Baylor	Thumb Drive
Mar-22	New Baylor Data	515	Baylor	FTP
<b>Total:</b>		595,860		

Notes:

1. **Redaction Images.** The images that Baylor provided for redaction application on 11/9/2021 and earlier this year are not included on this table. This is because those images were used by our review team to apply redactions to documents that *already* exist in the databases. Then those *existing* documents were produced with the redactions replicated. The images given were not actually uploaded into the database as new records.
2. **ULEX Migrated Data for Analysis.** There are files that were copied across databases for the purpose of comparison analysis. Those files are not listed multiple times because they are represented in their original databases.
3. **Document Count Delta.** There was a 402-document discrepancy noted in Restore 3 earlier in the thread by Eleeza in reference to the exhibit document shared in January 2020. We have audited the history of these records and believe these records were erroneously included in the initial report. These files are not listed on the above table as part of Restore 3 since the unique documents are accounted for in Restore 1.
  - **Record Count Delta.** There were only 2,892 documents received in the migration, as opposed to the 3,294 noted in the earlier charts. The 402-document delta (which brought the total to 3,294 documents reported from 2,892) were documents in which ULEX inadvertently loaded images – only images - into that database. The 402 docs were part of the documented 824 as “not validated” contained within the excel on the “Relativity Restore 3” tab in the exhibit shared by Eleeza. They were ultimately included in the ~33k document variance review that Unitedlex performed in 2020.
  - **Production of those Images.** These images were intended to be overlaid into existing files within Restore 1 for the purpose of production to PwC. They were then produced in both Restore 1 and Restore 3 to PwC in January 2020. In conclusion, the images were also put into and produced out of the Restore 1 database.

David West, RCA | Project Manager, Litigation Professional Services | [UnitedLex](#) | +1 (224) 221-8527



Upcoming OOO: None

**From:** Jim Dunnam <[jimdunnam@dunnamlaw.com](mailto:jimdunnam@dunnamlaw.com)>

**Sent:** Monday, June 27, 2022 12:09 PM

**To:** David West <[David.West@unitedlex.com](mailto:David.West@unitedlex.com)>; Danielle Hatchitt <[dhatchitt@wshllp.com](mailto:dhatchitt@wshllp.com)>

**Cc:** Colleen Murphey <[cmurphey@WSHLLP.com](mailto:cmurphey@WSHLLP.com)>; Jan Blair <[JBlair@WSHLLP.com](mailto:JBlair@WSHLLP.com)>; Vedran Camdzic <[vedran.camdzic@unitedlex.com](mailto:vedran.camdzic@unitedlex.com)>; Lauren Dinner <[Lauren.Dinner@unitedlex.com](mailto:Lauren.Dinner@unitedlex.com)>; Eleeza Johnson <[eleezajohnson@dunnamlaw.com](mailto:eleezajohnson@dunnamlaw.com)>; Julie Springer <[jspringer@wshllp.com](mailto:jspringer@wshllp.com)>; Jamie McConnell <[Jamie.McConnell@unitedlex.com](mailto:Jamie.McConnell@unitedlex.com)>; Christopher Burton <[christopher.burton@unitedlex.com](mailto:christopher.burton@unitedlex.com)>; Nicole Ratliff <[nicole@dunnamlaw.com](mailto:nicole@dunnamlaw.com)>; chad@brazilanddunn.com; Andrea Mehta <[andreamehta@dunnamlaw.com](mailto:andreamehta@dunnamlaw.com)>; Igeisler@texttrial.com; Jeff Brown <[Jeff.Brown@unitedlex.com](mailto:Jeff.Brown@unitedlex.com)>; Geoff Weisbart <[gweisbart@wshllp.com](mailto:gweisbart@wshllp.com)>; Mia Storm <[MStorm@WSHLLP.com](mailto:MStorm@WSHLLP.com)>; Sara Janes <[SJanes@WSHLLP.com](mailto:SJanes@WSHLLP.com)>; ULEX\_Baylor\_Doe\_et\_al\_v\_Baylor <[ULX\\_Baylor\\_Doe\\_et\\_al\\_v\\_Baylor@unitedlex.com](mailto:ULX_Baylor_Doe_et_al_v_Baylor@unitedlex.com)>; [quesada@texttrial.com](mailto:quesada@texttrial.com); [smccaffity@texttrial.com](mailto:smccaffity@texttrial.com); Lisa Brown <[lbrown@thompsonhorton.com](mailto:lbrown@thompsonhorton.com)>; Ryan Newman <[rnewman@thompsonhorton.com](mailto:rnewman@thompsonhorton.com)>; Holly McIntush <[hmcintush@thompsonhorton.com](mailto:hmcintush@thompsonhorton.com)>

**Subject:** New Court Order

[EXTERNAL EMAIL]

David

I wanted to appraised ULEX of the attached order issued this morning from Judge Pitman.

It was our understanding that ULEX was putting together a comprehensive listing of all documents that ULEX possesses that ULEX has not been turned over directly to Plaintiffs, and those that ULEX has turned over with redactions to Plaintiffs. This list is necessary to assure compliance with Judge Pitman's order. Can you advise as to the status of the list, and how long it will take to provide an accurate list. This would include –

For all documents that ULEX received from Pepper Hamilton

1. Documents not turned over to Plaintiffs by ULEX at all
2. Document turned over with redactions

The above would include all attachments to those documents – the entire documents sets. This would include only what ULEX has and has not itself turned over. Whether or not Baylor claims to have turned them over is irrelevant for this listing.

The same as the above for all documents ULEX received from Baylor.

Please advise. If you would like a phone call, we can set that up this week upon your availability.

Jim Dunnam

Dunnam & Dunnam LLP

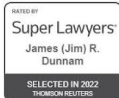
4125 W. Waco Drive

Waco, TX 76710

(254) 753-6437 Telephone

(254) 753-7434 Facsimile

[jimdunnam@dunnamlaw.com](mailto:jimdunnam@dunnamlaw.com)



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----- Forwarded message -----

From: Vedran Camdzic <vedran.camdzic@unitedlex.com>

To: Lauren Dinner <Lauren.Dinner@unitedlex.com>, Danielle Hatchitt <dhatchitt@wshllp.com>, Jim Dunnam <jimdunnam@dunnamlaw.com>

Cc: Eleeza Johnson <eleeezajohnson@dunnamlaw.com>, Julie Springer <JSpringer@wshllp.com>, Dana Fischer <Dana.Fischer@unitedlex.com>, Colleen Murphey <cmurphey@wshllp.com>, David West <David.West@unitedlex.com>, Jamie McConnell <Jamie.McConnell@unitedlex.com>, Christopher Burton <christopher.burton@unitedlex.com>, Nicole Ratliff <nicole@dunnamlaw.com>, "chad@brazilanddunn.com" <chad@brazilanddunn.com>, Andrea Mehta <andreamehta@dunnamlaw.com>, "lgeisler@texttrial.com" <lgeisler@texttrial.com>, Jeff Brown <Jeff.Brown@unitedlex.com>, Geoff Weisbart <Gweisbart@wshllp.com>, Jan Blair <JBlair@wshllp.com>, Mia Storm <MStorm@wshllp.com>, "Sara E. Janes" <SJanes@wshllp.com>, ULX\_Baylor\_Doe\_et\_al\_v\_Baylor <ULX\_Baylor\_Doe\_et\_al\_v\_Baylor@unitedlex.com>, "quesada@texttrial.com" <quesada@texttrial.com>, "smccaffity@texttrial.com" <smccaffity@texttrial.com>, Lisa Brown <lbrown@thompsonhorton.com>, Ryan Newman <rnewman@thompsonhorton.com>, Holly McIntush <hmcintush@thompsonhorton.com>

Bcc:

Date: Wed, 9 Mar 2022 22:36:34 +0000  
 Subject: RE: Reporting Request Discussion | 15511 Baylor

Hello, all.

Following up with the contents of each workspace to confirm the representation of source data, as Lauren alluded to earlier in her emails. Please review the below and confirm the highlighted "source" data information is correct per your records. Once the source data information is confirmed, we will be able to provide Jim with the number of total Baylor and Pepper Hamilton documents received and produced within the requested time frames.

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  - Production of those Images.** These images were intended to be overlaid into existing files within Restore 1 for the purpose of production to PwC. They were then produced in both Restore 1 and Restore 3 to PwC in January 2020. In conclusion, the images were also put into and produced out of the Restore 1 database.

Please let us know if any questions. If you would like to get on the phone to discuss please provide availability for tomorrow and we would be happy to schedule.

Thank you,

**Vedran Camdzic** | Team Lead, Litigation Professional Services | **UnitedLex** | +1.470.273.2008

**From:** Lauren Dinner <Lauren.Dinner@unitedlex.com>

**Sent:** Monday, March 7, 2022 7:15 PM

**To:** Danielle Hatchitt <dhatchitt@WSHLLP.com>; Jim Dunnam <jimdunnam@dunnamlaw.com>

**Cc:** Vedran Camdzic <vedran.camdzic@unitedlex.com>; Eleeza Johnson <eleezajohnson@dunnamlaw.com>; Julie Springer <JSpringer@WSHLLP.com>; Dana Fischer <Dana.Fischer@unitedlex.com>; Colleen Murphey <cmurphey@WSHLLP.com>; David West <David.West@unitedlex.com>; Jamie McConnell <Jamie.McConnell@unitedlex.com>; Christopher Burton <christopher.burton@unitedlex.com>; Nicole Ratliff <nicole@dunnamlaw.com>; chad@brazilanddunn.com; Andrea Mehta <andreamehta@dunnamlaw.com>; lgeisler@texttrial.com; Jeff Brown <Jeff.Brown@unitedlex.com>; Geoff Weisbart <Gweisbart@WSHLLP.com>; Jan Blair <JBlair@WSHLLP.com>; Mia Storm <MStorm@WSHLLP.com>; Sara E. Janes <SJanes@WSHLLP.com>; ULX\_Baylor\_Doe\_et\_al\_v\_Baylor <ULX\_Baylor\_Doe\_et\_al\_v\_Baylor@unitedlex.com>; quesada@texttrial.com; smcaffity@texttrial.com; Lisa Brown <lbrown@thompsonhorton.com>; Ryan Newman <rnewman@thompsonhorton.com>; Holly McIntush <hmcintush@thompsonhorton.com>

**Subject:** RE: Reporting Request Discussion | 15511 Baylor

Danielle – thank you for the clarification. The team is going to follow up with the chart of all data received for ease of reference and confirmation, and then Jim, we will be able to provide you the requested counts.

**Lauren Dinner** | Director, Litigation Professional Services | **UnitedLex** | +1.973.632.1636

**From:** Danielle Hatchitt <dhatchitt@WSHLLP.com>

**Sent:** Monday, March 7, 2022 7:14 PM

**To:** Lauren Dinner <Lauren.Dinner@unitedlex.com>; Jim Dunnam <jimdunnam@dunnamlaw.com>

**Cc:** Vedran Camdzic <vedran.camdzic@unitedlex.com>; Eleeza Johnson <eleezajohnson@dunnamlaw.com>; Julie Springer <JSpringer@WSHLLP.com>; Dana Fischer <Dana.Fischer@unitedlex.com>; Colleen Murphey <cmurphey@WSHLLP.com>; David West <David.West@unitedlex.com>; Jamie McConnell <Jamie.McConnell@unitedlex.com>; Christopher Burton <christopher.burton@unitedlex.com>; Nicole Ratliff <nicole@dunnamlaw.com>; chad@brazilanddunn.com; Andrea Mehta <andreamehta@dunnamlaw.com>; lgeisler@texttrial.com; Jeff Brown <Jeff.Brown@unitedlex.com>; Geoff Weisbart <Gweisbart@WSHLLP.com>; Jan Blair <JBlair@WSHLLP.com>; Mia Storm <MStorm@WSHLLP.com>; Sara E. Janes <SJanes@WSHLLP.com>; ULX\_Baylor\_Doe\_et\_al\_v\_Baylor <ULX\_Baylor\_Doe\_et\_al\_v\_Baylor@unitedlex.com>; quesada@texttrial.com; smccaffity@texttrial.com; Lisa Brown <lbrown@thompsonhorton.com>; Ryan Newman <rnewman@thompsonhorton.com>; Holly McIntush <hmcintush@thompsonhorton.com>

**Subject:** RE: Reporting Request Discussion | 15511 Baylor

[EXTERNAL EMAIL]

Hi Lauren, see my responses in red below. Just to make sure we are on the same page, both Thompson Horton and Weisbart Springer Hayes are litigation counsel for Baylor.

Thanks,

Dani

---

**From:** Lauren Dinner <Lauren.Dinner@unitedlex.com>

**Sent:** Monday, March 7, 2022 5:07 PM

**To:** Jim Dunnam <jimdunnam@dunnamlaw.com>; Danielle Hatchitt <dhatchitt@WSHLLP.com>

**Cc:** Vedran Camdzic <vedran.camdzic@unitedlex.com>; Eleeza Johnson <eleezajohnson@dunnamlaw.com>; Julie Springer <JSpringer@WSHLLP.com>; Dana Fischer <Dana.Fischer@unitedlex.com>; Colleen Murphey <cmurphey@WSHLLP.com>; David West <David.West@unitedlex.com>; Jamie McConnell <Jamie.McConnell@unitedlex.com>; Christopher Burton <christopher.burton@unitedlex.com>; Nicole Ratliff <nicole@dunnamlaw.com>; chad@brazilanddunn.com; Andrea Mehta <andreamehta@dunnamlaw.com>; lgeisler@texttrial.com; Jeff Brown <Jeff.Brown@unitedlex.com>; Geoff Weisbart <Gweisbart@WSHLLP.com>; Jan Blair <JBlair@WSHLLP.com>; Mia Storm <MStorm@WSHLLP.com>; Sara E. Janes <SJanes@WSHLLP.com>; ULX\_Baylor\_Doe\_et\_al\_v\_Baylor <ULX\_Baylor\_Doe\_et\_al\_v\_Baylor@unitedlex.com>; quesada@texttrial.com; smccaffity@texttrial.com; Lisa Brown <lbrown@thompsonhorton.com>; Ryan Newman <rnewman@thompsonhorton.com>; Holly McIntush <hmcintush@thompsonhorton.com>

**Subject:** RE: Reporting Request Discussion | 15511 Baylor

Danielle & Jim

**Danielle** – thank you for the additional information regarding identification of the parties, I think this helpful in gaining an understanding of the disposition of the parties in this matter and we are working sending a chart for source identification. Please see revised identification of “parties” and “affiliates”.

Parties and Affiliates:

1. Baylor Data

- a. Sent by PwC
- b. Sent by Thompson Horton
- c. Sent by Weisbart Springer Hayes

2. Pepper Hamilton

- a. Sent the original Hard Drive
- b. Thumb Drive
- c. CD
- d. FTP Received 07/09/2019 (was this sent by Pepper Hamilton)? **Yes. We believe that is correct.**

**Jim** – we are not asking Baylor what they sent, rather we are trying to understand the source of the data sets that we received. The UnitedLex team is going to follow up with a chart of all the data received to date and will request that the parties assist in identifying the source. Jim the purpose of confirming this information is so we can provide you the counts you are looking for (i.e., counts of produced documents as compared to initial data collections received). Going back through the UnitedLex’s records and call notes, we just need confirmation that the origin of the data sets is accurate. If you want to discuss this approach in further detail, let’s schedule a call to discuss.

Thank you,

Lauren

Lauren Dinner | Director, Litigation Professional Services | [UnitedLex](#) | +1.973.632.1636

**From:** Jim Dunnam <[jimdunnam@dunnamlaw.com](mailto:jimdunnam@dunnamlaw.com)>

**Sent:** Monday, March 7, 2022 4:25 PM

**To:** Danielle Hatchitt <[dhatchitt@WSHLLP.com](mailto:dhatchitt@WSHLLP.com)>; Lauren Dinner <[Lauren.Dinner@unitedlex.com](mailto:Lauren.Dinner@unitedlex.com)>

**Cc:** Vedran Camdzic <[vedran.camdzic@unitedlex.com](mailto:vedran.camdzic@unitedlex.com)>; Eleeza Johnson <[eleezajohnson@dunnamlaw.com](mailto:eleezajohnson@dunnamlaw.com)>; Julie Springer <[JSpringer@WSHLLP.com](mailto:JSpringer@WSHLLP.com)>; Dana Fischer <[Dana.Fischer@unitedlex.com](mailto:Dana.Fischer@unitedlex.com)>; Colleen Murphey <[cmurphey@WSHLLP.com](mailto:cmurphey@WSHLLP.com)>; David West <[David.West@unitedlex.com](mailto:David.West@unitedlex.com)>; Jamie McConnell <[Jamie.McConnell@unitedlex.com](mailto:Jamie.McConnell@unitedlex.com)>; Christopher Burton <[christopher.burton@unitedlex.com](mailto:christopher.burton@unitedlex.com)>; Nicole Ratliff <[nicole@dunnamlaw.com](mailto:nicole@dunnamlaw.com)>; chad@brazilanddunn.com; Andrea Mehta <[andreamehta@dunnamlaw.com](mailto:andreamehta@dunnamlaw.com)>; lgeisler@texttrial.com; Jeff Brown <[Jeff.Brown@unitedlex.com](mailto:Jeff.Brown@unitedlex.com)>; Geoff Weisbart <[Gweisbart@WSHLLP.com](mailto:Gweisbart@WSHLLP.com)>; Jan Blair <[JBlair@WSHLLP.com](mailto:JBlair@WSHLLP.com)>; Mia Storm <[MStorm@WSHLLP.com](mailto:MStorm@WSHLLP.com)>; Sara E. Janes <[SJanes@WSHLLP.com](mailto:SJanes@WSHLLP.com)>; ULX\_Baylor\_Doe\_et\_al\_v\_Baylor <[ULX\\_Baylor\\_Doe\\_et\\_al\\_v\\_Baylor@unitedlex.com](mailto:ULX_Baylor_Doe_et_al_v_Baylor@unitedlex.com)>; quesada@texttrial.com; smccaffity@texttrial.com; Lisa Brown <[lbrown@thompsonhorton.com](mailto:lbrown@thompsonhorton.com)>; Ryan Newman <[rnewman@thompsonhorton.com](mailto:rnewman@thompsonhorton.com)>; Holly McIntush <[hmcintush@thompsonhorton.com](mailto:hmcintush@thompsonhorton.com)>

**Subject:** RE: Reporting Request Discussion | 15511 Baylor

[EXTERNAL EMAIL]

Lauren

I have real concerns if this is just going to be where Baylor tells you what happened and what you did. I want to be very clear about our request. If we want to ask Baylor what they think, we will ask them. We are not asking what Baylor is telling you Baylor did or what Baylor tells you that you did. We are asking what UnitedLex has actually done according to UnitedLex's own records independent of whatever Baylor may or may not think. There needs to be no question about that.

Jim Dunnam

Dunnam & Dunnam LLP

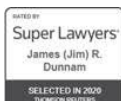
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**From:** Danielle Hatchitt <dhatchitt@WSHLLP.com>  
**Sent:** Monday, March 7, 2022 3:21 PM  
**To:** Lauren Dinner <Lauren.Dinner@unitedlex.com>  
**Cc:** Vedran Camdzic <vedran.camdzic@unitedlex.com>; Danielle Hatchitt <dhatchitt@WSHLLP.com>; Jim Dunnam <jimdunnam@dunnamlaw.com>; Eleeza Johnson <eleezajohnson@dunnamlaw.com>; Julie Springer <JSpringer@WSHLLP.com>; Dana Fischer <Dana.Fischer@unitedlex.com>; Colleen Murphey <cmurphey@WSHLLP.com>; David West <David.West@unitedlex.com>; Jamie McConnell <Jamie.McConnell@unitedlex.com>; Christopher Burton <christopher.burton@unitedlex.com>; Nicole Ratliff <nicole@dunnamlaw.com>; chad@brazilanddunn.com; Andrea Mehta <andreamehta@dunnamlaw.com>; lgeisler@textrial.com; Jeff Brown <Jeff.Brown@unitedlex.com>; Geoff Weisbart <Gweisbart@WSHLLP.com>; Jan Blair <JBlair@WSHLLP.com>; Mia Storm <MStorm@WSHLLP.com>; Sara E. Janes <SJanes@WSHLLP.com>; ULX\_Baylor\_Doe\_et\_al\_v\_Baylor <ULX\_Baylor\_Doe\_et\_al\_v\_Baylor@unitedlex.com>; quesada@textrial.com; smccaffity@textrial.com; Lisa Brown <lbrown@thompsonhorton.com>; Ryan Newman <rnewman@thompsonhorton.com>; Holly McIntush <hmcintush@thompsonhorton.com>  
**Subject:** RE: Reporting Request Discussion | 15511 Baylor

Hi Lauren,

Please see our comments and corrections to your email below. One overall issue is that I believe there is a misunderstanding about PWC's and Ryan Newman's (who is with Thompson Horton) relationship to Pepper Hamilton. Ryan Newman and her firm, Thompson Horton, represent Baylor. They do not represent Pepper Hamilton. Likewise, PWC provided documents to United Lex on behalf of Baylor – not Pepper Hamilton. So, this misunderstanding needs to be corrected throughout the information in your email below. I have highlighted these issues in yellow.

Additionally, I think your informational is missing several sets of data that were provided by Baylor to United Lex in 2021 and 2022. Our records reflect the following:

- 11/09/2021      Baylor provided VOL005 and VOL009 Images and joint instructions to United Lex for production to Plaintiffs
- 01/10/2022      United Lex email identifying issue with production of attachments from VOL005 and VOL009
- 01/20/2022      Additional Control numbers provided to United Lex to reflect additional documents for United Lex to produce (identified as a result of review of attachments) but otherwise Baylor does not agree to release attachments  
 Plaintiffs do not agree that attachments will not be produced

- 02/07/2022 United Lex produced VOL005 to the parties (Plaintiffs and Baylor)
- 02/15/2022 Per Order 1026, Ryan Newman (with Baylor) emailed United Lex 3 excel charts with instructions to release 454 documents that correspond to provided accounting logs
- 02/22/2022 United Lex produced first part of VOL009(a) to the parties (Plaintiffs and Baylor)
- 03/01/2022 Baylor provided VOL006-8, 10-20 spreadsheets, images and instructions to United Lex to produce to plaintiffs
- 03/03/2022 United Lex produced second part of VOL009(b) to the parties (Plaintiffs and Baylor)

Thanks,  
Dani

**From:** Lauren Dinner <Lauren.Dinner@unitedlex.com>  
**Sent:** Friday, March 4, 2022 1:33 PM  
**To:** Vedran Camdzic <vedran.camdzic@unitedlex.com>; Danielle Hatchitt <dhatchitt@WSHLLP.com>; Jim Dunnam <jimdunnam@dunnamlaw.com>; Eleeza Johnson <eleezajohnson@dunnamlaw.com>; Julie Springer <JSpringer@WSHLLP.com>; Dana Fischer <Dana.Fischer@unitedlex.com>; Colleen Murphey <cmurphey@WSHLLP.com>; David West <David.West@unitedlex.com>; Jamie McConnell <Jamie.McConnell@unitedlex.com>; Christopher Burton <christopher.burton@unitedlex.com>; Nicole Ratliff <nicole@dunnamlaw.com>; chad@brazilanddunn.com; Andrea Mehta <andreamehta@dunnamlaw.com>; lgeisler@texttrial.com; Jeff Brown <Jeff.Brown@unitedlex.com>; Geoff Weisbart <Gweisbart@WSHLLP.com>; Jan Blair <JBlair@WSHLLP.com>; Mia Storm <MStorm@WSHLLP.com>; Sara E. Janes <SJanes@WSHLLP.com>; ULX\_Baylor\_Doe\_et\_al\_v\_Baylor <ULX\_Baylor\_Doe\_et\_al\_v\_Baylor@unitedlex.com>; quesada@texttrial.com; smccaffity@texttrial.com; Lisa Brown <lbrown@thompsonhorton.com>; Ryan Newman <rnewman@thompsonhorton.com>; Holly McIntush <hmcintush@thompsonhorton.com>  
**Subject:** RE: Reporting Request Discussion | 15511 Baylor

Thank you all for your time on the call today. Please see below notes and provide additional information and/or revisions if needed. If it is helpful, we can jump back on a call this afternoon. Please note items in red for your feedback.

Our team has spent the time since the call this morning, going back through our records to ensure that the information provided is accurate and that all parties are under the same understanding. UnitedLex needed to confirm the data sources, so that we would be able to provide the produced document count of those data sources (*i.e., data received from Baylor vs data received from PwC on behalf of Pepper Hamilton*). Please review and upon confirmation, UnitedLex will be able to provide the production counts by source data.

Participants:

Dunammlaw	Baylor (WSHLLP)	Thompson Horton (PWC)	UnitedLex
Jim Dunnam	Danielle Hatchitt	Ryan Newman	Vedran Camdzic

Eleeza Johnson			Lauren Dinner
			Dana Fischer
			David West
			Jamie McConnell

**Background:**

1. Litigation commenced in 2016
2. UnitedLex was brought on or about July 2019.
3. Parties *(please let us know if there are other parties that should be included and or represented by other parties).*
  - a. PWC on behalf of Pepper Hamilton
  - b. Baylor
  - c. UnitedLex
  - d. Plaintiffs
4. **Restore ARM Files** received July 2019 by Unitedlex from PWC on behalf of Pepper Hamilton.
  - a. Restore 1 :: 1,329,615 documents
  - b. Restore 2 :: 126 documents
  - c. Restore 3 :: 2,892 documents.
5. **Workspace: Processed**
  - a. **Document Sets Received from Baylor (116,149 documents).** *(Danielle please confirm whether there are additional files that are sourced to Baylor).*
    - i. Baylor Provided Documents were loaded (12/12 and 12/13 of 2019) (17,182 documents)
    - ii. **Data Set. Sent by Ryan on behalf of Baylor 02/2020 (98,452 documents) These were email accounts of alleged assailants and this production to United Lex was unrelated to the comparison project.**
    - iii. Data Set. Received 02/18/2022 (515 documents)
6. **Pepper Hamilton.** Per the call today, it was confirmed that the three Relativity Restore workspaces were received from Pepper Hamilton. The Pepper Hamilton data was then compared against a data set received from PWC to identify where there was "**no match**" between those two data sets. That resulted in the list of the **33,377 documents** that make up the ***United Lex Accounting Log – ULX Comparison Disposition 09.22.2020*** (re-attached here for ease of reference)
7. **Prior Export Request:** on the call Ryan Newman forwarded an email from 05/11/2021 providing a list of 906 documents that instructed United Lex to provide to Plaintiffs' counsel (email attached here for ease of reference).
  - a. **[NOTE: This was subsequently completed and sent by UnitedLex to ALL PARTIES on 05/19/2021]**
8. Dunammlaw is requesting information associated with the documents produced to Plaintiffs as of February 4, 2022 and then as of March 4, 2022.
  - a. Summary of what was received from Pepper Hamilton and what was produced to Plaintiffs

b. Summary of what was received from Baylor and was produced to Plaintiffs

i. **Unitedlex Productions.** How many documents /pages produced to Plaintiff from Unitedlex.

ii. **Unitedlex Accounting Log.** Cross reference from the United Lex Account Log as to which categories the documents were produced from the various buckets listed below:

- 1. No Comparison File Provided
- 2. Substantive Match
- 3. Technical
- 4. Variance

9. Documents produced in 2022 by UnitedLex. The UnitedLex team will follow up with notes regarding additional Productions/Exports completed by UnitedLex (prior to 2022), to the extent there are any.

Production Volume	Documents	Pages	Date
ULJD11 VOL005	589	6,814	2/7/2022
ULJD09a VOL005	695	4,875	2/22/2022
ULJD09b VOL005	631	4,241	3/3/2022
	1,915	15,930	

Consolidating the requested format of the above-requested information received by Jim Dunnam

...

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